

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template****EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2013 covering the prior calendar year 2012

1. Date filed: 01/28/2013
2. Name of company(s) covered by this certification: Coast International, Inc.
3. Form 499 Filer ID: 813052
4. Name of signatory: Charles Brenneman
5. Title of signatory: Vice President
6. Certification:


I, Charles Brenneman, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  [Signature of an officer, as agent of the carrier]

**Attachments:**      Accompanying Statement explaining CPNI procedures  
                                 Explanation of actions taken against data brokers (if applicable)  
                                 Summary of customer complaints (if applicable)



Coast International, Inc. 499 Filer ID 813052  
2012 Annual Statement of FCC CPNI Rule Compliance  
January 28, 2013

***Coast International, Inc. CPNI Policy and Rules***

CPNI is defined by the Communications Act as "information that relates to the quantity, technical configuration, type, destination, location and amount of use of a telecommunications service" that the carrier possesses solely by virtue of serving that customer. Subscriber list information contained in published telephone directories is not CPNI.

Per the FCC's requirement Coast International, Inc. has adopted the following Policy.

All employees are trained to identify CPNI and to follow the procedures defined in this document, and required by the FCC, to protect CPNI. Department Supervisors routinely review these procedures to ensure compliance. Further an express disciplinary process is in place to address a situation where policy is not followed.

**Authentication Requirement:**

Coast International, Inc. will not release any CPNI information to any inbound caller without first identifying the caller. The following are acceptable methods for identifying the caller:

1. Providing CPNI information to an address of record
2. Calling the telephone number of record
3. Releasing the CPNI information in person at the offices of Coast International, if the customer presents a validly issued government photo ID, and the ID matches the information on the customer account in question.

If the caller is not identified by one of these methods, NO CPNI information can be released. Notification of the failed request should be sent to the Customer's address of record.

**Online Access:**

Coast International, Inc. will not release any CPNI information over the internet, email or its website. Customers wishing to receive CPNI information will have to be authenticated and receive the information based on the defined Authentication Requirement above.



**Notification of Account Changes:**

Coast International, Inc. will immediately notify customers of certain account changes. Account changes that require notification are:

1. Change to address of record
2. Change of main contact number
3. Change of name on account
4. Change of billing method
5. Any modification to other account identification or authentication methods

Notification will be sent to customer via postal mail within 3 business days of request to the address of record prior to the change.

**Notification of Unauthorized CPNI Disclosures:**

Coast International, Inc. will follow the requirements under Section 64.2011 should a breach of CPNI occur.

**Joint Venture and Independent Contractor Use of CPNI:**

Coast International, Inc. will not share CPNI data with joint venture partners or independent contractors. The company does not provide CPNI to other parties and thus has not used the opt-in approval process.

**Annual CPNI Certification:**

Coast International will file an annual CPNI certification with the FCC. The certification will be certified by an officer confirming that they have personal knowledge of the company's CPNI policies. Also a summary of all action taken against data brokers and a summary of all customer complaints received for the past year pertaining to unauthorized release of CPNI. Annual certification is typically due March 1.

**Business Customer Exemption:**

The FCC created an exemption to the password requirement for the release of call detail records over the phone for certain business customers. The FCC's customer authentication requirements for obtaining access to call detail records during an inbound call do not apply to business customers if the customer is serviced by a "dedicated account representative" as the primary contact and if the carrier and the carrier/customer contract specifically discuss the carrier's protection of CPNI. This exemption only applies if the customer is not required to go through a call center to reach a customer service representative.

**Data Protection:**

Coast International, Inc. has taken reasonable steps to secure and protect its networks and all data residing on the network. All customer data is protected via a firewall system and access is restricted. These systems are monitored to ensure they are functioning correctly.

**Marketing:**

Coast International, Inc. will not use any customer CPNI, unless at the direct request of the customer. Approve of use of CPNI will be recorded at the time of request.

**Actions Taken Against Data Brokers and Responses to Customer Complaints:**

Pursuant to Section 64.2009, the company make the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.

No actions taken, No customer complaints received.